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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Tonianne J. Bongiovanni

v. : Mag. No. 21-3000 (TJB)

MANFREDO VALDEZ-SANTIAGO, : **CRIMINAL COMPLAINT**  
a/k/a "Manfredo Valdez"

I, Natasha A. McSeed, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Deportation Officer of the United States Department of Homeland Security, Immigration and Customs Enforcement, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

*Natasha McSeed*

Natasha A. McSeed  
Deportation Officer  
United States Department of  
Homeland Security, Immigration  
and Customs Enforcement

Attested to me by telephone, pursuant to FRCP 4.1(b)(2)(A),

January 11, 2021  
Date

District of New Jersey

Honorable Tonianne J. Bongiovanni  
United States Magistrate Judge  
Name & Title of Judicial Officer

*Tonianne J. Bongiovanni*  
Signature of Judicial Officer

RECEIVED

JAN 11 2021

AT 8:30 M  
WILLIAM T. WALSH  
CLERK

**ATTACHMENT A**

**COUNT ONE**

**(Illegal Reentry to the United States)**

Between on or about July 31, 2013, and on or about July 27, 2018, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

MANFREDO VALDEZ-SANTIAGO,  
a/k/a "Manfredo Valdez,"

an alien who had been deported and removed and had departed the United States while an order of deportation and removal was outstanding, without the express consent of the Secretary of Homeland Security or the Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter and was found in the United States.

In violation of Title 8, United States Code, Section 1326(a).

**ATTACHMENT B**

I, Natasha A. McSeed, am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint, defendant Manfredo Valdez-Santiago, a/k/a "Manfred Valdez" ("VALDEZ"), was an alien and a citizen and national of the Republic of Guatemala.

2. On or about July 24, 2013, VALDEZ illegally entered the United States in or around Pharr, Texas, and was subsequently apprehended by a United States Border Patrol Agent.

3. On or about July 29, 2013, VALDEZ was ordered removed from the United States by a Supervisory Immigration Officer, pursuant to, among other provisions, 8 U.S.C. §§ 1182(a)(7)(A)(i)(I). On or about July 31, 2013, VALDEZ was removed from the United States to Guatemala, pursuant to the order of removal.

4. Thereafter, VALDEZ knowingly and voluntarily reentered the United States without permission on an unknown date and was found in the United States on or about July 27, 2018, when he was arrested by law enforcement officers in Matawan, New Jersey and charged with, among other things, aggravated assault. On or about March 15, 2019, VALDEZ was convicted in the Superior Court of New Jersey, Monmouth County, of aggravated assault causing or attempting to cause serious bodily injury, and he was sentenced to three years' imprisonment.

5. Neither the Attorney General nor the Secretary of Homeland Security of the United States expressly consented to VALDEZ reapplying for admission to the United States prior to his reembarkation at a place outside the United States or his entry into the United States.